UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY

Caption in compliance with D.N.J. LBR 9004-1(b)

Courtney M. Brown VEDDER PRICE P.C. 1633 Broadway, 31st Floor New York, New York 10019

Tel.: (212)407-7700

Email: cmbrown@vedderprice.com

Counsel for CMR Limited Partnership

In re:

BED BATH & BEYOND INC., et al.,

Debtor.

Case No. 23-13359 (VFP)

Chapter 11

Judge Vincent F. Papalia

(Joint Administration Requested)

DECLARATION OF DAVID L. KANE, ESQ., IN SUPPORT OF APPLICATION FOR *PRO HAC VICE* ADMISSION

DAVID L. KANE, of full age, hereby certifies under penalties of perjury pursuant to 28 U.S.C. §1746 as follows:

- 1. I am a shareholder of the law firm of Vedder Price P.C., with offices in Chicago, New York, Washington, D.C., San Francisco, Los Angeles, Dallas, London, Singapore, and Miami. My office is located at 222 North LaSalle Street, Suite 2600, Chicago, Illinois.
- 2. Because of my familiarity with the facts and circumstances relevant to the above-captioned Chapter 11 cases (the "Chapter 11 Cases"), CMR Limited Partnership ("CMR"), a creditor of one or more Debtors in the above-captioned matter, has requested that I be admitted to appear *pro hac vice* for the purposes of representing them in the Chapter 11 Cases. I submit this Certification in support of the application for my admission *pro hac vice*

Case 23-13359-VFP Doc 258-1 Filed 05/08/23 Entered 05/08/23 10:24:59 Description in Support Page 2 of 3

(the "Application").

- 3. I certify that I am eligible for admission to this Court. I am a member in good standing of the bar of the State of Illinois (2002), as confirmed by the Certificate annexed as **Exhibit A** hereto. The address of the Illinois Supreme Court Clerk is Supreme Court Building, 200 E. Capitol Avenue, Springfield, Illinois, 62701. I am also admitted to practice before the United States District Court for the Northern District of Illinois (2002), the United States District Court for the Eastern District of Wisconsin (2010), and the United States District Court for the Western District of Wisconsin (2010). I am also admitted to practice before the Seventh Circuit Court of Appeals (2010). I am in good standing before the courts in which I am admitted, and I have not been disbarred, suspended, or disciplined by any court or administrative body.
- 4. If the Application is granted, I agree to abide by this Court's local rules, to submit myself to the disciplinary jurisdiction of this Court, and to make payment to the New Jersey Lawyer's Fund for Client Protection as provided in New Jersey Court Rule 1:28-2(a) and to the District Court under L. Civ. R. 101.1(c)(3).
- 5. I have agreed to be associated in this matter with New Jersey counsel for CMR, Courtney M. Brown, Esq., of Vedder Price P.C., located at 1633 Broadway, 31st Floor, New York, NY 10019.
- 6. I hereby request receipt of notification via electronic mail of all electronic filings in the above-captioned action by delivering such notification to the e-mail address dkane@vedderprice.com.
- 7. For the foregoing reasons, I respectfully request my Application for admission *pro hac vice* be granted.

Case 23-13359-VFP Doc 258-1 Filed 05/08/23 Entered 05/08/23 10:24:59 Desc Declaration in support Page 3 of 3

I declare under penalty of perjury that the foregoing is true and correct.

DATED: May <u>5</u>, 2023

Respectfully submitted,

David L. Kane